

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
CENTRAL DIVISION**

LEAGUE OF WOMEN VOTERS OF
MISSOURI, ST. LOUIS A. PHILIP
RANDOLPH INSTITUTE, and
GREATER KANSAS CITY A.
PHILIP RANDOLPH INSTITUTE,

Plaintiffs,

v.

No. 2:18-cv-04073-BCW

JOHN R. ASHCROFT,
in his official capacity as the Missouri
Secretary of State, and

JOEL W. WALTERS,
in his official capacity as the Director
of the Missouri Department of
Revenue,

Defendants.

Notice of 30(b)(6) Deposition

TO: John R. Ashcroft, in his official capacity as the Director of the Missouri
Secretary of State
by his attorney, C. Douglas Shull
Assistant Attorney General
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PLEASE TAKE NOTICE that, pursuant to Federal Rule of Civil Procedure
30(b)(6), the undersigned will take the deposition, on oral examination before a
stenographer, of the Missouri Secretary of State, on July 26, 2018, commencing at

9:30 a.m., at the Office of the Missouri Attorney General, 221 West High Street, Jefferson City, Missouri 65101, and continuing between the hours of 8:00 a.m. to 6:00 p.m. from day to day thereafter until completed. Such deposition is intended to be used for any lawful and proper purposes, including use at trial as evidence.

Pursuant to Rule 30(b)(6), Defendant Ashcroft shall designate one or more officers, directors, managing agents, or other persons who shall be designated to testify on behalf of the Missouri Secretary of State, regarding all information known or reasonably available, with respect to the following:

- (1) How voter registration information is entered and updated in the Missouri Voter Registration System, including (a) the roles and responsibilities of local election officials and state election officials in maintaining voter registration information and (b) the information available to local election officials versus state election officials.
- (2) How the Secretary of State's Office, in discharging its obligations under Section 5 of the NVRA, interacts with local election officials and the Department of Revenue ("DOR"), including the process and procedure by which the Secretary of State's Office oversees and coordinates with local election officials, the DOR, and local motor vehicle license offices to receive and process address changes and voter registration information submitted by or through DOR and local motor vehicle license offices.

(3) Means to implement, and expenses of and burdens associated with, implementing relief to address the violations alleged in Plaintiffs' Preliminary Injunction Motion and the attendant Suggestions in Support, including, but not limited to, Plaintiffs' Proposed Preliminary Injunction Remedy.

To the extent that more than one deponent is identified, Defendant Ashcroft shall state in advance of the deposition which portions of this notice each deponent is prepared to address. This deposition is limited in the above-noted topics and is taken based upon agreement of the parties that any remaining portion of this deposition may be taken at a later date prior to any trial on the merits.

Respectfully Submitted,

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Attorneys for Plaintiffs

- * Admitted *pro hac vice*
- ** Not admitted in the District of Columbia;
practice limited pursuant to D.C. App.
R.49(c)(3).
- *** Admission pending

CERTIFICATE OF SERVICE

I hereby certify that on July 16, 2018, a copy of the foregoing was served on counsel of record by operation of the Court's CM/ECF system.

/s/ Gillian R. Wilcox